

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 22-CV-11553

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NATALIE ANDERSON,  
Plaintiff,

v.

MARRIOTT INTERNATIONAL, INC.,  
RESIDENCE INN NASHUA (formerly  
known as RESIDENCE INN BY  
MARRIOTT located in NASHUA and is  
also the DBA of NASHUA TS LODGING,  
LLC); TRUE NORTH HOTEL GROUP  
AND JENNIFER BROOKS,  
Defendants.

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**DEFENDANTS' MOTION TO DISMISS**

Defendants, Marriott International, Inc., Nashua TS Holdings, LLC d/b/a Residence Inn Nashua, True North Hotel Group, Inc., and Jennifer Brooks (collectively, the “defendants”) move to dismiss the plaintiff’s complaint pursuant to Fed. R. Civ. P. 12(b)(5) for insufficiency of service of process and failure to comply with a court order, as well as Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted on the grounds the plaintiff has failed to plead sufficient facts upon which relief can be granted. *See Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007).

Defendants further rely upon and refer the Court to their memorandum of law, submitted herewith.

WHEREFORE, the defendants, Marriott International, Inc., Nashua TS Holdings, LLC d/b/a Residence Inn Nashua, True North Hotel Group, Inc., and Jennifer Brooks, respectfully

request the Court dismiss the plaintiff's complaint, with prejudice, together with such other relief as the Court deems just and proper.

The Defendants,  
MARRIOTT INTERNATIONAL, INC.,  
NASHUA TS LODGING LLC; TRUE NORTH  
HOTEL GROUP; INC., and JENNIFER  
BROOKS,  
By Their Attorneys,

MORRISON MAHONEY LLP

*/s/ Amy B. Yarbro*

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**CERTIFICATE OF SERVICE**

I, Amy B. Yarbro, attorney for the defendants, hereby certify that I have this day served the foregoing to all parties of record in this action by e-mail to:

Natalie Anderson  
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Dated: September 28, 2022 Attorney: */s/ Amy B. Yarbro*  
Amy B. Yarbro